

Fill in this information to identify the case:

Debtor 1 Ashley Irene Small

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of Pennsylvania
(State)

Case number 19-02055-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Freedom Mortgage Corporation Court claim no. (if known): 3

Last 4 digits of any number you use to identify the debtor's account: 1730 _____

Property address: 129 Clearview Road
Number Street

Aspers, Pennsylvania 17304
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: ____/____/____
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 0.00
- b. Total fees, charges, expenses, escrow, and costs outstanding: PPFN filed 09/30/2019 + (b) \$ 900.00
- c. **Total.** Add lines a and b. (c) \$ 900.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: 12 / 1 / 2023
MM / DD / YYYY

Debtor 1 Ashley Irene Small
First Name Middle Name Last Name

Case number (if known) 19-02055-HWV

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

11/22/23

x /s/ Andrew M. Lubin
Signature

Date 11/22/23

Print Andrew M. Lubin
First Name Middle Name Last Name

Title Attorney for creditor

Company McCabe, Weisberg & Conway, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 1420 Walnut Street, Suite 1501
Number Street

Philadelphia, PA 19102
City State ZIP Code

Contact phone (215) 790 - 1010

Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Ashley Irene Small

Debtor(s)

Freedom Mortgage Corporation, or its Successor
or Assignee

Movant

vs.

Ashley Irene Small

Jack N Zaharopoulos

Respondent(s)

Chapter 13

Bankruptcy No. 19-02055-HWV

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE
PAYMENT**

I, Andrew M. Lubin, attorney for Freedom Mortgage Corporation, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 11/22/23

Ashley Irene Small
129 Clearview Road
Aspers, Pennsylvania 17304

Gary J Imblum
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, Pennsylvania
17111
Attorney for Debtors

Jack N Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, Pennsylvania
17036
Trustee

United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, Pennsylvania
17102

/s/ Andrew M. Lubin

MARISA MYERS COHEN, ESQUIRE ID #87830

ANDREW M. LUBIN, ESQUIRE ID # 54297

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